

REMARKS

Claims 1-3, 5-7, and 9-14 are pending in the application. Claims 1, 9 and 10 have been amended hereby. Claim 14 has been cancelled, without prejudice or disclaimer. Claims 1, 9, and 10 are in independent form. Favorable reconsideration is requested.

Reconsideration is respectfully requested of the rejection of Claims 1-3, 5-7, 9, 10, 12, and 13 under 35 U.S.C. §102(b), and Claim 11 under 35 U.S.C. §103(a), as being unpatentable over U.S. Patent No. 6,761,635 B2 (“Hoshino”).

It is respectfully submitted that, for the following reasons, there are differences between Hoshino and the presently claimed invention at least with respect to the claimed relay unit.

Regarding claim 1, Examiner states that Hoshino discloses “a *relay unit* incorporated in a gaming system” which functions to connect one or more manipulation terminals (controllers) or external storage units to an entertainment apparatus, and that the apparatus has at least a first mode and a second mode for operating games stored on CDs and DVDs etc. It is respectfully submitted that Hoshino does not, in fact, teach such a relay unit, at least not as presently claimed. As a preliminary point, Hoshino makes no reference to the existence of any “relay unit” associated with the device, neither in the specification, nor in the claims. While the invention described in Hoshino clearly has some hardware which functions to transfer information between a controller and the entertainment apparatus (the I/O Processor and the controller plug-in portions), this is an internal relay which presumably exists in all “gaming” systems and is a function of the entertainment apparatus itself. The relay unit of the present invention, however, functions to allow multiple controllers or storage devices to connect to and interact with the entertainment apparatus via a single port. Furthermore, the innovation of the applicant’s invention is that while conventional relay units (which allow multiple controllers to interact with

the entertainment apparatus via a single port) are only compatible with a single mode, and thus have to be manually swapped when the entertainment apparatus switches to a secondary mode (such as from DVD mode to CD mode), the current invention employs multiple relay processing units, as well as a detection system, allowing compatibility with multiple operation modes, thus alleviating the need to manually change the hardware.

To better clarify this distinction, Applicant has amended independent Claims 1, 9, and 10 to more clearly indicate the type and function of the “relay unit” in the current invention.

Examiner further indicates that Hoshino teaches that when the entertainment apparatus determines an operation mode based on the inserted recording medium, an operation mode selection signal is generated and is output to the relay unit. Examiner refers to column 12, lines 20-25 (“when the optical disk in [sic] is detected as being a DVD game, the system enters controller emulation mode”). However, in light of the above clarification, it is respectfully submitted that this too is a separate function from that which is presently claimed.

The Hoshino patent may imply the existence of a communication which changes the system in the *entertainment device* from one mode to another. However, this is completely unrelated to any external relay unit. The current application, however, claims a signal which is sent to the relay unit upon determination of a different operation mode in the entertainment apparatus, and which causes the relay unit to switch from one relay processing unit to a second relay processing unit (within the same device) when the entertainment apparatus switches from a first operation mode to a second operation mode, thus ensuring compatibility between the entertainment apparatus and the relay unit.

To the extent which Examiner’s comments are all directed toward functions which occur in or affect the *system apparatus* (and its multiple modes) only, it is respectfully submitted that

these comments do not apply to the claimed invention, of which the primary focus is the *relay unit* (and its multiple relay processing units). Accordingly, it is respectfully submitted that independent Claims 1, 9, and 10, and the claims depending therefrom, are patentably distinct over Hoshino.

In view of the remarks set forth above, this application is believed to be in condition for allowance which action is respectfully requested. However, if for any reason the Examiner should consider this application not to be in condition for allowance, the Examiner is respectfully requested to telephone the undersigned attorney at the number listed below prior to issuing a further Action.

Any fee due with this paper may be charged to Deposit Account No. 50-1290.

Favorable reconsideration is earnestly solicited.

Respectfully submitted,

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